

The South Carolina State Historic Preservation Office offers the following comments in reference to the Nationwide Programmatic Agreement for Review of Effects on Historic Properties For Certain Undertakings approved by the Federal Communications Commission.

III.A.4: Our recommendation is to eliminate this entire section as there are too many problems with the language and it does nothing to assure SHPOs that historic properties will not be affected by an undertaking that meets the parameters outlined here. Our concerns are as follows:

1. Defining property in this section as occupying "an area of 10,000 square feet or more, or that together with adjacent commercial, industrial, and/or government-office properties occupies an area of 10,000 square feet or more" is too restrictive and will exclude SHPO review on projects that will still have the potential to affect historic properties.
2. How does an applicant identify a "structure 45 years or older" without consulting with the SHPO?
3. The 200' distance from the proposed facility is too limited and towers could still have an effect on historic districts whose boundary may be more than 200' from the facility. Even 400' is not a great enough distance.
4. At the least, additional provisions should be added to this Section to ensure SHPO review, namely "if the proposed facility lies within 3/4 mile of and is visible from a unit of the National Park System that is listed or eligible for listing in the National Register, or a National Historic Landmark."